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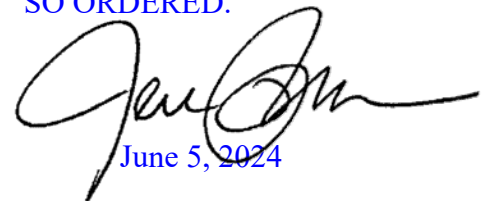
June 4, 2024

**BY ECF**

Application GRANTED on consent. The Clerk is directed to terminate ECF No. 794.

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

SO ORDERED.



June 5, 2024

*Re:* **United States v. Arguedas (Denise Bullock), 20 Cr. 135**

Dear Judge Furman:

We represent Denise Bullock in the above captioned matter. We write with the support of Ms. Bullock's Probation Officer, Alicia Black, to request the removal of two bail conditions placed on Ms. Bullock at the November 21, 2023 Violation of Supervised Release ("VOSR") hearing. Specifically, we respectfully request the removal of the conditions of (1) home confinement and (2) location monitoring. *See* VOSR Hr'g. Tr. at 28, ECF No. 758. These conditions are no longer the "least restrictive" conditions necessary to reasonably assure Ms. Bullock's appearance at future court appearances and the safety of the community. 18 U.S.C. § 3142(c)(1)(B). The government does not oppose the removal of these bail conditions.

## **Procedural History**

On November 9, 2023, the United States Probation Department issued a violation report and request for summons with respect to Ms. Bullock. The specifications contained in the violation report relate to two matters that at the time were pending in Bronx Criminal Court under the case numbers: CR-023174-23BX and CR-023175-23BX.

On November 21, 2023, Ms. Bullock appeared before Your Honor in connection with the violation report, was arraigned, and entered a plea of not guilty. The Court imposed three conditions of release on Ms. Bullock: (1) home confinement, (2) location monitoring (by means of an ankle bracelet), and (3) that Ms. Bullock have no contact, direct or indirect, with her ex-boyfriend. VOSR Hr'g. Tr. at 24, 28–29.

The matter was then adjourned to January 16, 2024, in light of Ms. Bullock's next scheduled appearance in Bronx Criminal Court, which at the time was January 8, 2024. The matter was further adjourned to March 12, 2024, after Ms. Bullock's scheduled appearance in Bronx Criminal Court was adjourned to March 6, 2024.

The March 6, 2024 hearing in Bronx Criminal Court took place as scheduled and resulted in the dismissal of one of the two pending matters—CR-023174-23BX, relating to Specifications 7-13 in the violation report. The Bronx Criminal Court further adjourned the matter to April 23, 2024 on the remaining case—CR-023175-23BX, relating to Specifications 1-6 in the violation report. Following that development, this Court adjourned the VOSR hearing scheduled for March 12, 2024 to May 2, 2024.

On April 23, 2024, Ms. Bullock appeared before the Bronx Criminal Court as scheduled. We understand that the court appearance resulted in the dismissal of the remaining case—CR-023175-23BX, relating to Specifications 1-6 in the violation report—and that the case was sealed.

On May 1, 2024, the parties requested a 30-day adjournment of the VOSR hearing scheduled for May 2, 2024, in light of the parties' ongoing discussions regarding a potential disposition. The Court granted that request and adjourned the VOSR hearing to May 29, 2024.

On May 24, 2024, the parties requested a second 30-day adjournment of the VOSR hearing, given the parties' ongoing discussions regarding a potential disposition. The Court granted that request and further adjourned the VOSR hearing to June 26, 2024, at 11:30 a.m.

### **Request for Modification**

After more than five months of compliance with the bail conditions imposed by the Court at the November 21, 2023 hearing, Ms. Bullock and her case are now very differently situated. *First*, the state charges underlying the violation report have been dismissed and sealed. *Second*, Probation has shared with us that in the time since November 21, 2023, Ms. Bullock has demonstrated significant improvements in many respects, and as a result, Probation has no concern with, and no objection to, Ms. Bullock no longer being subject to home confinement and location monitoring by means of an ankle bracelet. *Third*, on May 6, 2024, Ms. Bullock gave birth to a baby boy. The removal of the conditions of home confinement and location monitoring will best enable Ms. Bullock to continue to recover and care for her children, including her newborn son.<sup>1</sup>

Notwithstanding the requested modifications to Ms. Bullock's bail conditions, she will of course remain in frequent contact with her Probation Officer, as she has continuously done since November 21, 2023, and she is committed to continuing the positive track record she has demonstrated over the past five months.

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<sup>1</sup> In addition to discussing a potential resolution of this matter, the parties continue to discuss a potential modification of the third bail condition placed on Ms. Bullock: that she have no contact, direct or indirect, with her ex-boyfriend (who is the father of Ms. Bullock's one-month old son). In light of those ongoing conversations, Ms. Bullock's current request is limited to seeking modification and removal of the conditions of home confinement and location monitoring.

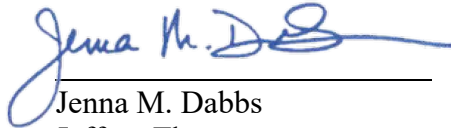
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Accordingly, with the consent of Probation, and for the reasons above, we respectfully request that the Court modify Ms. Bullock's conditions of release to remove the home confinement and location monitoring conditions that this Court imposed at the November 21, 2023 hearing. The government does not oppose this modification.

We appreciate the Court's consideration.

Respectfully submitted,

A handwritten signature in blue ink, reading "Jenna M. Dabbs", is written over a horizontal line.

Jenna M. Dabbs

Jeffrey Then

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*Counsel for Denise Bullock*

cc: Assistant United States Attorneys Ryan Nees and Brandon Harper  
U.S. Probation Officer Alicia A. Black